1271 Avenue of the Americas
New York, New York  10020-1401
Tel: +1.212.906.1200  Fax: +1.212.751.4864
www.lw.com
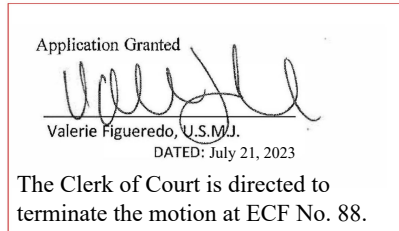
# LATHAM&WATKINS LLP

July 19, 2023

**Application Granted**

*Valerie Figueredo, U.S.M.J.*
DATED: July 21, 2023

The Clerk of Court is directed to
terminate the motion at ECF No. 88.

FIRM / AFFILIATE OFFICES

| | |
|---|---|
| Austin | Milan |
| Beijing | Munich |
| Boston | New York |
| Brussels | Orange County |
| Century City | Paris |
| Chicago | Riyadh |
| Dubai | San Diego |
| Düsseldorf | San Francisco |
| Frankfurt | Seoul |
| Hamburg | Shanghai |
| Hong Kong | Silicon Valley |
| Houston | Singapore |
| London | Tel Aviv |
| Los Angeles | Tokyo |
| Madrid | Washington, D.C. |

**VIA ECF**

Honorable Valerie Figueredo
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
New York, New York 10007

Re:     *In re Matter of the Ex Parte Application of B&C KB Holding GmbH for an Order to take Discovery Pursuant to 28 U.S.C. § 1782 from Goldberg Lindsay & Co. LLC and Michael Dees,* Case No. 1:22-mc-00180-LAK-VF

Dear Judge Figueredo:

On behalf of Respondents, and with consent of all counsel of record, we respectfully request that the Court extend the deadline for Respondents to file their anticipated motion to quash the subpoenas served by B&C KB Holding GmbH ("B&C"), or in the alternative, for a protective order and for a stay of discovery.

The current deadline to file the motion is July 21, 2023. *See* ECF No. 86 at 30:18-20. After conferring with counsel for B&C, and due to Respondents' counsels' trial schedule and personal commitments, the parties respectfully request a brief extension of three business days, until July 26, 2023, for Respondents to file their motion, with B&C's responsive submission to be filed no later than August 4, 2023 (with permission to file earlier).

There have been no prior requests for such an extension. We appreciate the Court's consideration of this request.

Respectfully submitted,

/s/ Eric F. Leon
Eric F. Leon
of LATHAM & WATKINS LLP

cc:     All Counsel of Record (via ECF)